



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JJD  
F.#2010R00014

*United States Attorney's Office  
610 Federal Plaza  
Central Islip, New York 11722-4454*

September 24, 2010

By Federal Express  
Corporal Patrick McDevitt  
Nassau County Correctional Center  
100 Carman Avenue  
East Meadow, New York 11554  
Telephone No.: 516-572-3536

Warden William Zerillo  
Queens Private Correctional Facility  
182-22 150<sup>th</sup> Avenue  
Jamaica, New York 11413-4009  
Telephone No.: 718-553-5420

Re: United States v. Prado *et al.*  
Criminal Docket No. 10-074 (S-2) (JFB)

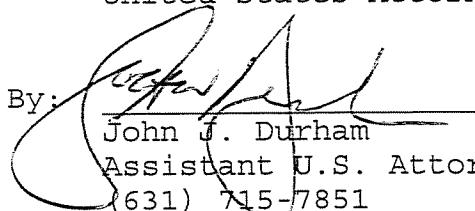
Dear Corporal McDevitt and Warden Zerillo:

Please find enclosed herewith a supplemental, Rule 16 discovery letter and fourteen disks with discovery materials in connection with the above-referenced matter. As previously discussed, United States District Judge Joseph F. Bianco has directed the government to provide copies of all Rule 16 discovery materials in connection with this case to the Nassau County Correctional Center ("NCCC") and the Queens Private Correctional Facility ("QPCF") and to ensure that they are made available to the defendants listed on Exhibit 1, who are housed at the NCCC and QPCF. Further, the government is aware of the Nassau County Sheriff's Department's Guidelines regarding discovery materials, which are attached hereto as Exhibit 2 and incorporated by reference. Finally, as set forth in the enclosed discovery letter, several of the enclosed discovery items are subject to a Protective Order signed by Judge Bianco, a copy of which is attached to the discovery letter.

If you have any questions, please do not hesitate to contact me at the number below.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: 

John J. Durham  
Assistant U.S. Attorney  
(631) 715-7851

Exhibits

Enclosures

cc: Clerk of the Court (JFB) (By ECF w/o enclosures)  
All Counsel of Record (By ECF w/o enclosures)

EXHIBIT 1

GIOVANNI PRADO  
ERICK ALVARADO  
ELENILSON ORTIZ  
EFRAIN ZUNIGA  
YONIS ACOSTA-YANES  
DIEGO NINOS  
SERGIO MEJIA-BARRERA  
EMILIO SABALLOS  
WALTER FLORES-REYES  
DAVID VALLE  
LOUIS RUIZ  
FRANCISCO RAMOS  
CESAR LANDAVERDE  
HERIBERTO MARTINEZ  
VIDAL ESPINAL  
ROGER ALVARADO  
CARLOS MARTINEZ  
JOSE GUSTAVO ORELLANA-TORRES  
MARIO ALPHONSO HERRERA-UMANZOR  
JIMMY SOSA  
JEREMIAS EXEQUIEL AMAYA  
JOSE SALAZAR ERAZO

EXHIBIT 2

EDWARD R. SUOZZI  
COUNTY EXECUTIVE

EDWARD REILLY  
SHERIFF



SHERIFF'S DEPARTMENT  
NASSAU COUNTY CORRECTIONAL CENTER  
100 CARMAN AVENUE  
EAST MEADOW, NY 11554

## DISCOVERY MATERIALS via ELECTRONIC MEDIA GUIDELINES

The following procedures must be followed for the acceptance of discovery materials via electronic media by the Nassau County Sheriff's Department:

1. The materials submitted to the Correction Center must come directly from the inmate's criminal attorney of record to the Sheriff's Department/Correctional Center Inmate Law Library either via parcel or by hand delivery.
2. The materials must be accompanied by an original writing from the attorney setting forth in sufficient detail the type and quantity of the materials being submitted, and the attorney must affirmatively state that the review of such materials by the subject inmate is necessary to the pending criminal proceedings.
3. The attorney must affirmatively state that the materials are not covered by any attorney-client privilege and the materials are subject to inspection by security staff at any time.
4. The attorney must affirmatively acknowledge that the materials will be maintained by the Sheriff's Department/Correctional Center at all times and the subject inmate will be provided with opportunities to view such materials at times not unduly disruptive to the daily operations of the facility.
5. The attorney must provide for a means or method by which the Sheriff's Department/Correctional Center can return the materials at the completion of the review by the subject inmate at no cost to the facility.

06-23-05